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MEMO ENDORSED

November 16, 2017

BY ECF

The Honorable Lewis A. Kaplan United States District Judge Southern District of New York Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, NY 10007

Re: United States v. David Blaszczak et al., No. 17 Cr. 357 (LAK)

Dear Judge Kaplan:

We write on behalf of Christopher Worrall with respect to a requested modification of his bail conditions. Currently, Mr. Worrall is permitted to travel within Maryland and the Southern and Eastern Districts of New York (in addition to previously-approved employment-related travel). We respectfully request that Mr. Worrall be permitted to travel with his family over the holidays as follows: to Ocean City, New Jersey from November 21 through November 27 for the Thanksgiving holiday; to travel between Maryland, where he resides, and the Eastern District of New York, where he will be (with trips into Manhattan) from December 22 through December 28 for the Christmas holiday; and to make day trips to Delaware over the New Year's Day holiday, December 30 to January 2, during which Mr. Worrall will be staying just over the Delaware state line in Ocean City, Maryland.

We have contacted Mr. Worrall's pre-trial services officers in the Southern District of New York and the District of Maryland, and they do not object to this request. We have alerted the government, which likewise does not object to this request.

Respectfully submitted,

s/ John Nathanson
Stephen Fishbein
John Nathanson
Shearman & Sterling LLP
599 Lexington Avenue

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ABU DHABI | BEIJING | BRUSSELS | DUBAI | FRANKFURT | HONG KONG LONDON A MENLO PARK | MILAN | NEW YORK PARIS | ROME | SAN FRANCISCO | SÃO PAULO | SAUDI ARABIA* | SHANGHOVE | TOKYO | TORONTO | WASHINGTON, DC

The Honorable Lewis A. Kaplan

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Pre-Trial Services Officers



U.S. Department of Justice

United States Attorney Southern District of New York

The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

November 16, 2017

BY E-MAIL

The Honorable Lewis A. Kaplan United States District Judge Southern District of New York 500 Pearl Street, Room 2240 New York, New York 10007

Re:

United States v. David Blaszczak et al.

17 Cr. 357 (LAK)

Dear Judge Kaplan:

The Government writes in response to defendant Christopher Worrall's November 16, 2017 request to modify the terms of his bail conditions. The Government has no objection to the defendant's request.

Respectfully submitted,

JOON H. KIM Acting United States Attorney

By: <u>/s/</u>

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